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Anne-Marie Greene, Gill Kirton, John Wrench

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**Anne-marie Greene, Gill Kirton and John
Wrench**

University of Warwick and Queen Mary, University of London, UK
and EMCRX, AUSTRIA

Trade Union Perspectives on Diversity Management: A Comparison of the UK and Denmark

ABSTRACT ■ This article compares the viewpoints of trade union activists in the UK and Denmark on diversity management. While this concept is spreading rapidly across Europe, very different attitudes are revealed among equality activists and officials in the two countries. The article distinguishes between understandings of diversity management as a descriptor, theoretical approach, and policy approach. The main differences between the countries emerge with regard to diversity management as a policy approach, which is regarded with great scepticism in the UK and with great enthusiasm in Denmark. Explanations for these differences are offered, involving prior experiences of anti-discrimination activities, industrial relations approaches, and the wider political context.

Introduction

Established as a relatively common business practice in the US, the concept of diversity management is rapidly spreading across Europe. It is argued that organizations in Europe will have to manage diversity successfully in order to respond to economic recession, demographic change, and globalization (Kandola and Fullerton, 1994). Diversity or 'difference' approaches have thus become increasingly prominent in managerial rhetoric in many EU countries, arguably replacing traditional concepts of equal opportunities. In the UK in particular, this has led to debates on whether the practice is simply a name change or a new policy approach to equality delivering significantly different outcomes (for example, Kirton and Greene, 2005a; Liff, 1999; Lorbiecki and Jack, 2000).

The demographic changes facing the US and western Europe, especially the increase in minority ethnic and women workers entering

the labour market, are described as the 'primary spur' for the development of diversity management (Kandola and Fullerton, 1994: 31). In addition, it is likely that national legislation on equality and discrimination will to some extent converge as a consequence of European directives. However, will the existence of common external forces mean that we will see convergence around diversity management, and will the various industrial relations actors respond in a uniform way? Though diversity management has become relatively uncontroversial and part of normal organizational practice in the US, this does not necessarily mean that the same will happen in Europe. Critics argue against a universal concept of diversity, on the grounds that embedded within it are US-centric assumptions about organizations and the politics of difference (Jones et al., 2000). This is particularly salient when making cross-national comparisons.

One difference between the US and EU is the role of unions in the employment relationship. Unsurprisingly, given extremely low unionization in the US, the diversity management literature has tended to focus on senior management and neglect the role of unions. Currently, even though research exploring the role of unions and the equality agenda exists in a number of European countries, such as the UK, there is very little investigation of practical and intellectual responses to the diversity discourse. It should not be assumed that these will be uniform. There are many dimensions of difference among European unions: whether they are historically located in Catholic, socialist, or communist confederations, whether they are politicized or institutionalized, whether they have a high or low membership density and so on. There are also national differences of context potentially relevant to diversity issues relating to gender and race.

This article addresses this issue by bringing together two studies which explore the role of unions and diversity management. We address how diversity management is understood within the European context from the perspective of trade union activists in two countries: the UK and Denmark. We do this in order to discuss, at least tentatively, the implications of national similarities and differences in addressing gender and race inequality in different national contexts.

Methods

This article draws on qualitative research carried out in the UK and Denmark between 1999 and 2004. The UK material derives from semi-structured interviews with 10 national union equality officers in eight unions and the Trades Union Congress (TUC), plus interviews in four unions with 14 paid and lay officials with a negotiating role. The unions

were chosen to represent a broad spectrum of employees in professional, white- and blue-collar occupations and the public and private sectors. Because of the fragmented and decentralized nature of collective bargaining and consultation in the UK, the role of national union equality officers is generally advisory and policy-making, rather than of direct involvement in negotiations. They are therefore in a good position to offer insights into national union responses to diversity management. The negotiators are able to provide insights based on their workplace experiences.

The Danish material is based on a research project funded by the Statens Samfundsvidenskabelige Forskningsråd (Social Science Research Council). The study involved interviews with 20 activists, most of whom were members of *Netværk i Fagbevægelsen* (NIF or, literally, 'Network in the Union Movement'). This is not a union as such, but a network for foreigners, ethnic minorities and refugees who are members of unions, as well as Danes who wish to involve themselves in issues of ethnic equality in unions, the labour market, and the workplace. Interviews were also carried out with three activists working in non-governmental organizations (NGOs) concerned with ethnic equality issues.

Thus the two samples differ somewhat: in the UK, involving a mixture of national officers and lay activists; in Denmark, primarily lay activists and just two full-time officials. It is also relevant that the Danish study was designed to investigate union policies on race and ethnicity issues, starting from the basis of a broader comparison of responses to immigrants and minority ethnic workers. The focus was not on diversity management as a primary interest, but the topic featured strongly in interviews. The UK interviews explicitly explored diversity management, but also considered union responses to a wider range of equality issues. Gender and race emerged as central themes, but other diversity issues were addressed, such as disability, age and sexual orientation.

Despite these differences, there is significant utility in comparing the two sets of findings. First, this is because there is such a paucity of research investigating unions and diversity management, and our studies allow us to offer at least tentative conclusions and indicate issues for future research. Second, the comparison is valid because the focal issues in each country reflect the typical territory of diversity management. In Denmark, the concept of diversity is used primarily in relation to ethnicity and race (Wrench, 2004b), while in the UK, both gender and ethnicity and race are primary categories included. Third, and perhaps most importantly, most studies of equality and diversity now acknowledge the salience of the intersection of race and gender and the importance of transversal coalitions for advancing employment equality.

Setting the Context

The concept of diversity is used in a variety of ways and can refer to fundamentally different issues. It is helpful to outline three of these as a way of framing union responses to diversity. First, 'diversity' is a descriptor of the workforce; for example, Noon and Ogbonna (2001) talk of diversity as a 'neutral descriptor of variation within the workplace'. Second, it denotes a particular policy approach (variously termed 'diversity management', 'managing diversity', or 'diversity policy') whereby organizations are urged to value workforce diversity in order to achieve success. This typically involves a focus on individuals rather than social groups; the primacy of the business case rather than the social justice case for equality; and the positioning of diversity policy as a top-down, managerial activity rather than one involving unions and other industrial relations actors (Kirton and Greene, forthcoming). Lastly, 'diversity' refers to a theoretical approach, underpinning which are theories of disadvantage and inequality that move away from traditional liberal and radical conceptions of equality based on a 'sameness' approach (Jewson and Mason, 1986) and towards theories of difference and of multiple social identities (Liff, 1997).

Clearly, the three usages of 'diversity' overlap, but they can be delineated separately as views or theoretical conceptions of what counts as a diverse workforce, with significance for the kind of policy interventions deemed appropriate by different actors. However, there is in practice no simple connection between theoretical understandings of difference and disadvantage and policy approaches. For example, a view that individuals have a multiplicity of identities may lead to an orientation which sees all individuals as 'uniquely diverse', entailing totally individualized policy interventions. On the other hand, awareness of multiple identities may be rooted in a conceptualization of difference based around social groups, which means that policy interventions would include a broader range of social identities than traditionally included within equal opportunities policies (not simply gender and race).

Unions today do not generally have problems with diversity as a 'descriptor', and indeed many of the unionists in our studies speak of the importance of recognizing and representing the diversity within their membership and the wider workforce. However, this is a relatively recent trend; historically, unions have taken a more unitary, class-based approach to identifying worker interests and bargaining objectives. The idea of common interests within organizations or occupations has been used to build solidarity among groups of employees, but has led to a narrow bargaining agenda which fails to take account of the diversity of union membership (Dickens, 1997). This narrow bargaining agenda is explained, in part at least, by the fact that union decision-making

structures in Europe are generally unrepresentative of membership diversity, particularly of women and minority ethnic members (ETUC, 2002), even in countries, such as Sweden, seen as most gender egalitarian (Curtin and Higgins, 1998).

More recently, however, the need to recognize a plurality of interests within diverse groups of union members has begun to permeate union policy and practice in the UK and some other European countries: approaches to equality and diversity are now influenced by the concept of intersecting and multiple identities (Colgan and Ledwith, 2002). Accordingly, Munro (2001: 454) calls for a new feminist union agenda which includes 'sensitivity to diversity' and gives more attention to the interests of working-class and black women. Hyman's (1997) analysis offers some further elaboration, recognizing the way in which interests as citizens, as well as more personalized life-style concerns, are forming part (or should form part) of union representation. Despite their mixed record historically on tackling inequalities and their weakened position in much of Europe, unions in some countries are now more comfortable with an equality agenda which recognizes elements of difference.

However, unions appear to have more reservations with diversity as a policy approach, not surprisingly since this is the area where management appears to be the driving force. Elsewhere (Kirton and Greene, forthcoming; Wrench, 2005a), we have discussed the grounds on which European trade unions might resist elements of the diversity discourse, as against that of traditional equal opportunities. We can identify four main areas of concern: the emphasis on the individual rather than social groups, the business case rather than moral and social justice, the threat of marginalizing the union and the neglect of the realities of discrimination. We explore below whether Danish and UK unionists identify the same concerns and issues.

Before this, it is useful to outline the industrial relations and equality contexts of Denmark and the UK. Despite the significant decline in union membership in the UK over the past 20 years, unionized settings still account for around 45 percent of workplaces with more than 25 employees, employing 62 percent of the workforce (Cully et al., 1999); certain sectors, such as public services, have considerably higher than average density levels. In Denmark, union density is 80–90 percent, the highest in the EU, and collective bargaining coverage stands at 83 percent (EIRO, 2003). Furthermore, the strength of Danish unions lies not simply in numbers, but in the integration of powerful central organizations and effective workplace representation mechanisms (Scheuer, 1992).

One important difference is that British industrial relations has traditionally involved 'adversarial' patterns, whereas Denmark has displayed widespread cooperation and consensus between unions and employers and their organizations with 'widespread codetermination/

democracy in working life' (Lind, 2000: 146). The collective responsibility for policing agreements gives unions a great deal of formal power, largely independent of membership militancy and levels of unemployment (Scheuer, 1992). Danish governments have not been antagonistic towards unions, in strong contrast with the direct undermining of union power by the Conservative governments in the UK between 1979 and 1997. British unions do not have the political legitimacy or the institutionalized cooperation of their Danish counterparts, and are relatively weak compared to those in Denmark.

Similar patterns of horizontal and vertical gender segregation exist in both countries (Fagan and Burchell, 2002) and the gender pay gap is virtually the same (18 percent in the UK and 16 percent in Denmark) (EIRO, 2002). There are similar proportions of minority ethnic populations in the UK and Denmark, and there is similar evidence of employment segregation by race and ethnicity, with higher unemployment rates and lower pay for minority ethnic workers (Wrench, 2004b).

Legislation outlawing sex discrimination and promoting equality between women and men at work is long-standing in both countries. In the UK, continuing gender inequalities are widely acknowledged, and official bodies such as the Equal Opportunities Commission and the Women and Equality Unit within the Department of Trade and Industry are charged with addressing the issue. (See www.womenandequality.unit.gov.uk for information on government initiatives on equality issues.) In contrast, in Denmark a discourse of gender equality is prevalent, and it is widely believed that most problems have been resolved. Arguably, this has led to a slow development of measures such as gender monitoring of pay, although there is an Equal Status Department and Knowledge Centre for Equal Opportunities (Rubery, 2002).

In respect of race and ethnicity, in the UK anti-discrimination legislation has existed for some 30 years and the government has committed resources to tackling racism. In Denmark, legislation was not introduced until 1996 and one reason can be found in the 'consensus' character of industrial relations, with the tradition of social partners resolving problems through cooperation and discussion. It was long felt in Denmark that the problem of discrimination at work could be resolved in this way, rather than by law, and both employers' organizations and unions resisted the introduction of such legislation (Hjarnø, 1995).

In the UK, equality legislation has underpinned organizational policy-making for at least the past two decades and recent evidence indicates that two-thirds of organizations now have an equality or diversity policy in which gender and race are primary concerns (Cully et al., 1999). In Denmark, while there has been a long history of discourse and policies relating to gender equality at work, there has been no equivalent tradition of anti-discrimination activities or broader equal opportunities policies

regarding race and ethnicity. For many years, it was felt that because union agreements guaranteed foreign nationals the same conditions of employment, wages, vacation and unemployment insurance as Danes, there was no need for further measures (Hjarnø, 1995).

Traditional liberal 'sameness' models of equal opportunities have shaped the policy strategies and interventions of British unions over the past 20 years. This has led critics to assert that the equality agenda has not been as progressive as it might have been, with gender and race issues being of only marginal concern. However, recent attempts to revitalize the union movement place a strong emphasis on greater inclusion of women and black and minority ethnic workers and their specific concerns (Colling and Dickens, 2001). More radical measures embodying positive action have now become commonplace, and some unions having amended their rules and structures, allowing 'self-organization', special committees, and conferences, so as to facilitate a greater participation of women and minorities in union activities and on local and national governing bodies.

In Denmark, gender equality has long been a central concern of union activists, with long-standing policies to ensure women's participation in national and international union bodies, and a high level of female representation in union structures (ETUC, 2002). However, the policy response of unions to their immigrant and ethnic minority membership has been much slower than in the UK. The main focus has been on 'integration', with an emphasis on education and training courses for immigrants themselves, and on counselling and advice measures. When barriers to equality have been recognized in the attitudes and practices of employers or union members, solutions have typically been sought in campaigns of information and persuasion (Wrench, 2004a). Changes to union structures and policies, such as positive action or reserved places on union committees for ethnic minorities, are still rare or unknown. It has even been argued that the strength of the discourse on equality for women in Denmark was one reason for the slowness of the left to develop an effective anti-racist stance. A far higher proportion of immigrants and ethnic minorities in Denmark have a Muslim religious background than in the UK; in wider societal discourse, the word 'immigrant' becomes almost interchangeable with 'Muslim', bringing with it a corresponding range of prejudices and negative stereotypes, including a popular construction of minority ethnic groups as oppressive to women and a threat to gender equality (Wren, 2001). This causes resistance to 'multiculturalism', whereas in Britain the idea of a multicultural society is less controversial (Wrench, 2004a).

In sum, there are important differences between the UK and Denmark. First, there are contrasts in the relative attention to race and gender issues. Second, the kinds of union equality practices emphasized in Denmark can

be viewed as more consistent with a 'consensus' approach, whereas those in the UK are more consistent with the 'conflict' approach to industrial relations. Third, there are interesting links between wider societal and political discourses and union policies, meaning that regarding race issues, union activists in the UK work more from 'anti-racist' assumptions than 'multicultural' ones, with the opposite being true for Denmark.

Trade Unions and Diversity in the UK and Denmark: Activist Responses

In the UK study, activists were asked to discuss what they understood by the term 'managing diversity'. Their responses most often covered the 'descriptor' and 'policy approach' definitions discussed above. The Danish interviewees were asked about their awareness of the existence of 'diversity management' as an equality policy and for their opinions and responses.

In terms of the 'descriptor' usage, British unionists generally agreed that it was important to recognize the diversity of the workforce and that there was a need to represent diversity more effectively. A TUC official responded: 'do unions and others talk about diversity within groups? Well of course they do. In the area of race equality, there has been a determination to call everybody black and to talk about the commonalities of discrimination that people experience, but there is still awareness that there are differences within groups'. There was agreement on the need to recognize diversity within social groups as well as common interests. Most of the officers we spoke to viewed as positive the extension of the equality agenda beyond the traditional 'equal opportunities' target groups, with two Unifi (finance sector) activists seeing equality as concentrating on gender and race, while diversity allowed a broader concern with age, sexual orientation, and disability.

Aspects of an alternative theoretical approach to diversity were also expressed. A Unifi negotiating officer was particularly concerned to adopt a multiple identities approach that recognized the impact of the intersection between race and gender: 'there is also, you know, the double jeopardy of being a black woman and not getting any promotion through, through the grades, through the system'.

As in the UK, Danish activists agreed on the importance of recognizing membership diversity. Gender equality and representation within unions have long been part of union discourse and practice in Denmark, but now there is also growing awareness that Danish unions need to represent their minority ethnic members more effectively. HK, the commercial and clerical employees' union, has a tradition of gender equality practice and

has more recently adopted the strongest ethnic equality programme in Denmark. An official stated that the union was planning in the near future to adopt a broader diversity policy to integrate gender, ethnicity and other dimensions. Part of the original rationale for setting up the NIF network was the recognition that traditional union bargaining and campaign agendas were too narrowly defined and needed to reflect the diversity of members. NIF activists noted that it was rare for immigrant members to be involved in the union, as they did not feel particularly 'welcome' at meetings, and one respondent declared that many unions were not aware they had a problem if their immigrant members were not active, 'It is important that the unions also go out and involve foreigners and ask what they would like'.

It is when we turn to diversity as a policy approach that we uncover substantial differences of opinion between UK and Danish activists: agreement on the importance of recognizing workforce diversity did not entail uniform responses to diversity as an organizational policy approach. Interviews with British unionists consistently revealed scepticism or even outright hostility to diversity management as a policy approach, whereas the Danish interviews provided no evidence of such suspicion.

The first basis of this difference concerned views relating to the ownership of diversity management. For British activists, diversity management is typically perceived as a purely managerialist intervention, in contrast to equal opportunities which include a 'grass-roots' dimension. A national official of the GMB general union commented: 'we would talk equal rights . . . The equality issues are more in the hands of the union people . . . [but diversity is] more in the hands of the human resources people, that there's a kind of diversity industry springing up'. Similarly, a national official of the GPMU print union argued that diversity 'is about valuing the individual. We don't have a problem with it in itself, but it's the idea that management are going to deliver that as opposed to the individuals being part of setting the agenda collectively'.

Second, UK activists were concerned about the business case rationale for diversity management. Adhering to an 'equal opportunities' approach, which might be considered (in the words of the TUC) 'outdated terminology', is therefore justified by the emphasis placed on social justice and tackling discrimination. What clearly emerged from the interviews was criticism of diversity as a policy approach because of its primarily business-driven and individual focus. For example, a TUC official mentioned 'a suspicion that managing diversity is all about individuals . . . rather than the commonality of disadvantage that some groups can experience . . . The concept that we still cling to . . . is overcoming disadvantage and getting rid of discrimination [which] is not something that employers feel comfortable with'. Likewise, a Unifi official

expressed suspicion: 'it's the "organizational goals are met" bit, at the end . . . And the question then arises of, actually does that conflict with people's talents being fully utilized if their talents actually don't [meet] the organizational goals?'

This is not to say that British unions do not recognize the importance of making a business case for equality. As pragmatists, they have traditionally used business case arguments in equality bargaining (Liff and Dickens, 2000), and do so when negotiating with employers on diversity management. For example, a national official of Connect (the union for professionals in communications) said that:

what diversity might have done is to strengthen the business argument so that it's seen as much more of a mainstream issue, which is good. So I think some of the language of diversity has been quite helpful there, rather than negative. In any case it was always much better for us to make business case arguments, but of course we're always concerned about the moral issues.

An official from the CWU, the main communications union, added that:

occasionally I might use business case arguments, for example with women engineers, because I think there is a real business case for having more. I think the same goes for ethnic minorities — you've got a huge pool of untapped talent, so yes there is sometimes a business case to be made for making use of people from diverse backgrounds. But I'm not particularly keen on basing my arguments on the business case because I think fairness and justice have to be something that unions are about.

What is significant about the views of the British unionists, however, is their stress on the importance of continuing to argue the social justice case for equality in order to avoid the pitfalls of a purely business-driven approach. The interviewees expressed concerns that some issues, for which there was not a convincing business case, could be removed from the agenda without an explicit policy commitment to tackle discrimination.

In contrast, the Danish activists gave no evidence of any such suspicion, and seemed to accept diversity management as a policy approach implicitly and uncritically. Activists who were aware of diversity management were strongly in favour of it, and saw it as the way forward in Denmark. Not all had heard about diversity management, but when it was explained, the minority who had not heard of the concept, reported that they thought that it sounded like a 'good idea'. A respondent employed at one of the main institutes for providing training courses for unions, when asked if he was aware of any objections to diversity management within the Danish labour movement, replied 'No, I have never heard that. It's not my experience'.

Danish activists expressed no fears about the individualized focus of diversity management. Their generally positive views may simply mean that they were not aware of it as potentially problematic, given that

interviewees were probed using mainstream definitions of diversity management and they had no experience of its 'individualizing' forms to draw upon. However, as we will argue later, Danish activists did oppose policy mechanisms such as ethnic monitoring. Their view seemed in theory, whether consciously or not, to fit with the diversity management preference for a focus on the individual rather than social groups.

The Danish interviews also revealed positive views about the business rationale for diversity management; indeed, unions in Denmark engage directly with the business case rationale. For example, research commissioned in 2001 by HK was used by the union to argue forcefully in favour of diversity management as a way of improving the competitiveness of companies by making it easier to recruit scarce labour. Because Danish unions have relatively little experience of the 'group-based' equality tradition found in British unions, they see diversity management not as an alternative which undermines this tradition, but as a timely and opportune way to introduce equality measures onto the workplace agenda by using messages which appeal to employers. Diversity management also fits well with the Nordic tradition, outlined earlier, of consensus and cooperation with employers, and the corresponding assumption on the part of union representatives that, generally speaking, it is in the union's interests that the employer's business makes money.

In addition, it is significant that some of the larger Danish unions, plus the main confederation, LO, affiliated to Foreningen Nydansker, an organization set up in 1998 with the aim of setting a positive agenda in the business community regarding diversity practices in employment (although in 2003, the LO withdrew its membership after a disagreement over integration policy).

Is it possible for unions to appropriate the language of management to tackle discrimination and disadvantage or is a distinct language that confronts these difficult issues necessary? Perhaps the harshest criticism of diversity management made by British activists was that it did not effectively tackle discrimination. In particular, most interviewees agreed that diversity policies were largely concerned with attitudinal orientations, involving initiatives aimed at improving understanding of 'different' cultures and helping people to feel comfortable at work. These policies were viewed as problematic. A national official of the public services union, PCS, remarked: 'it's begun to worry us slightly because there was a bit of a tendency towards multi-culturalism . . . that if you could only understand that certain ethnic groups had curry for lunch on a Sunday, then the world would be a better place. As if that would dismantle discrimination.' A TUC official elaborated:

you can manage the fact that you've got all these different people within your organization, you can manage that, but it's a whole different ball

game entirely when you start thinking, well black people face racism and this is what racism is . . . There's an underlying power relation and this is how racism manifests itself. But I think that's a whole different thing to thinking about managing. I mean I don't think you can manage inequality, you might be able to manage diversity, but you can't manage inequality — you have to tackle inequality.

For most interviewees, part of the critique of diversity management as a tool to tackle discrimination was that it was extremely difficult to measure the success of diversity policies:

I want lots of legislation and rules because I don't think anything will change otherwise . . . Well it would be lovely if it happened, wouldn't it? But what are the levers that would make it happen? That's the gap isn't it? How do you measure, even if you adopt a diversity policy and a strategy and link it to your organization objectives, that whole concept, how do you measure its success? More productivity? How do you know you're making progress? Attitude surveys? Are people getting happier? (PCS national official)

In the words of the TUC official quoted above, diversity can be managed, but discrimination has to be tackled. Therefore, a diversity approach did not meet the objectives of the union agenda on discrimination, and it needed to be underpinned by more traditional equal opportunities measures based on regulation, procedures, and group-based policies.

In contrast, the Danish activists appeared to believe that the diversity approach was highly appropriate for addressing inequality. For example, one of the respondents was an 'equality adviser' at one of the main trade union institutes, responsible for designing and running training courses for unions. He saw part of his job as filling the gap that existed in traditional training courses on the topic of 'ethnic equality', and he was introducing topics such as 'intercultural communication', 'diversity management' and 'the diverse working place' as part of the curriculum.

Such contrasting views clearly inform perspectives on typical policy responses of activists in the two countries. For example, in Britain, monitoring the demographic characteristics of workforce and union membership, especially for gender and race and ethnicity, is central to equality policy, and is unquestioned by the activists we interviewed; but the Danish interviews reveal mixed, but largely negative responses to the idea of demographic monitoring. Several activists saw it as 'not the Danish way of doing things', and clearly this reflects a different context of wider political discourse. Interestingly, many of the views of activists opposed to monitoring seemed to fit, perhaps unconsciously, with a diversity discourse that downplays the importance of social groups: 'I think perhaps Denmark is different from many other countries because we're not that categorical. We take each individual and we look at that

individual. We don't put them into boxes'. Some even argued that statistics were unobtainable because Danish law prohibits the registration of ethnic origin. However, while this is a common assumption, this claim was contradicted by a full-time official who described how by cross-referencing his membership files with official data from *Statistik Danmark* it was possible to identify how many members came from an immigrant background. Nevertheless, the legal ambiguity surrounding the practice of ethnic monitoring made it difficult for those who wanted to monitor, and provided a good excuse for those who did not.

Generally, there was opposition in Denmark to many positive action initiatives, such as special or targeted training and special committees (such as the black workers' committees found in British unions), and a lack of bargaining for anti-discrimination policies. Most Danish respondents had never considered negotiating policies against racial harassment at the workplace. Wrench (2004b) considers in more detail whether the weaker emphasis in Danish unions on issues of racism, discrimination, and harassment reflects a situation where these issues are genuinely less of a problem than in the UK. However, the majority of Danish activists were very well aware of the existence of racial discrimination in their country and could list many instances where minority ethnic workers were treated unfavourably, including the negative effects of prejudiced, stereotyped views and racist attitudes. These examples are very similar to those the UK activists could relate. However, while gender and race are at the centre of UK union equality policy, unions are not reported as taking up issues of race discrimination in Denmark in the same way. Indeed, 18 out of the 20 Danish activists could not describe, in their own or anyone else's experience, one instance of a union helping a victim of racial discrimination, particularly in taking cases to court. In general, activists viewed their unions as unable or unwilling to help, sometimes because of prejudicial attitudes within the union, but more importantly, from officers' lack of knowledge about how to handle discrimination cases and where to turn for appropriate guidance.

Overall, in the UK, positive action policies which aim to address structural inequalities are well established as appropriate. However, in Denmark, while positive action has been seen as appropriate for addressing gender inequality, in the case of race, the emphasis has been on improving the participation of minority ethnic members without significant change to current structures. One implicit assumption underlying many of the Danish initiatives is that the problem of ethnic inequality is in part related to deficits in the minority ethnic communities themselves and another is that changes in union and employer practice will come about through education and awareness raising. This contrasts directly with the underlying assumption in Britain of the existence of racism and discrimination as processes of exclusion, and hence the stronger focus on

changing structures and policing behaviour. Thus, the Danish union approach to increasing the representation of a more diverse membership would seem to fit much more with the diversity management perspective than in the UK.

Discussion and Conclusions

This comparison has revealed very different attitudes to diversity management among equality activists and officials in the UK and Denmark. Put simply, diversity management as a policy approach is regarded with great scepticism in Britain and with great enthusiasm in Denmark. In order to understand these differences, we need to recognize a number of factors at work. First, the different prior experiences of anti-discrimination activities of the two union movements before the arrival of diversity management predisposes the unions to respond very differently. Second, it could be argued that the managing diversity approach favoured by the Danes and the combating inequality approach favoured by the British are respectively more consistent with the consensus and conflict dimensions of their industrial relations approaches, particularly with regard to race issues. Third, there are very different political contexts regarding multiculturalism. In the context of the extremely negative Danish political discourse on multiculturalism, the promotion of diversity management is seen by unions to be a progressive development, which fits very well with a diversity approach which celebrates the business benefits of a culturally diverse workforce. However, for the union activists in the UK, the multicultural diversity approach is contrasted not with stances of 'anti-multiculturalism', but with an alternative strategy to foster ethnic equality, namely, equal opportunities policies with anti-discrimination and positive action. Therefore, people with experience of equality struggles within the British union movement see a move in the direction of diversity management as a retrograde step.

While the industrial relations climate in Denmark is more consensual, and explains, in part, the more cooperative orientation to diversity of Danish unionists, British unions now face a relatively hostile climate, where it is more difficult to mobilize members to take collective action. This means that they are turning to business-friendly arguments to persuade employers to take action in a range of policy areas, as demonstrated by the TUC position on partnership or work-life balance. Hence the unions' negotiating practices might sometimes appear to belie their beliefs and values. In other words, both Danish and British unions might go along in practice with a diversity policy, but with the British unions maintaining at the same time a level of principled opposition to the approach.

The union perspective on diversity management is important to the extent that diversity has taken hold in the UK and is spreading across Europe as the 'new' approach to equality policy-making. Without empirical knowledge we will only be able to speculate on what diversity means for European unions. By bringing together the two studies of the UK and Denmark, this article provides understanding of unions' engagement with diversity within a European context and helps evaluate why unions view diversity management differently. We have suggested that key elements of the diversity approach are likely to cause concern for unions: the focus on the individual, the emphasis of the business case, and the identification of diversity as a top-down managerial activity. It is clear from the two studies that there is not a universal union perspective on diversity management; yet it is evident that the recognition of workforce and membership diversity means that unions in both countries believe it necessary to develop specific policy and practical responses to address diverse concerns (hence they accept diversity as a descriptor). However, with regard to diversity as a policy approach, they have to choose whether to engage with diversity management or continue to push traditional equality approaches.

That unions may engage more or less positively with diversity as a policy approach clearly depends on the national industrial relations and equality contexts. It is interesting that in practice there are significant national variations in the way in which diversity management has penetrated union thinking, regardless of the convergence of legislation in Europe and conceptual development of diversity (Wrench, 2005b). This is not necessarily a weakness; some have argued against a 'global discourse of assimilation' where the American model of diversity management is adopted in Europe and throughout the world (Jones et al., 2000). It has been asked elsewhere how transferable US theories and practices of human resource management are to Europe (Harzing and Van Ruysseveldt, 1995), and the same question needs to be asked about diversity management.

However, does the acknowledgement of the effects of different contexts mean that we should uncritically accept that unions in different countries are justified in responding differently to diversity management? One fundamental issue that cannot be avoided is that the language of diversity is overwhelmingly positive. The problem with this positive language is that it removes the linguistic and discursive tools with which to describe and therefore tackle discrimination and disadvantage; instead, diversity becomes something unproblematic to be valued and celebrated. While unions in both countries did not disagree with the aim of valuing all individuals, this is not the actual situation they believe their diverse members face. Further, the idea within diversity that people are different, that they have different needs and so we should expect different

outcomes is dangerous if the goal is equality for all, because in all likelihood, such different outcomes will be unfair and unequal in terms of the distribution of social rewards. Against this, the idea that diversity can be managed consensually without a political struggle is likely to prove false, as was clearly recognized by the British, but not by the Danish unionists.

It is also clear that as pragmatic organizations, unions in both countries are using the language of diversity to advance the equality agenda where it seems the most appropriate way of persuading management to engage with equality issues. Our comparison has shown how the diversity management discourse may be used in different ways, however. In Denmark, unions have used it to pursue involvement in addressing the previously neglected issue of race and ethnic inequality. In contrast, British unions have used it to pursue traditional group-based equality issues (gender and race), while also seeing it as a way of broadening the equality agenda.

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ANNE-MARIE GREENE is Senior Lecturer in Industrial Relations at the University of Warwick.

ADDRESS: Warwick Business School, University of Warwick, Coventry CV4 7AL, UK. [e-mail: anne-marie.greene@wbs.ac.uk]

GILL KIRTON is Senior Lecturer in Employment Relations at the Centre for Business Management, Queen Mary, University of London.

ADDRESS: Queen Mary, University of London, Centre for Business Management, Mile End Road, London E1 4NS, UK.

[e-mail: g.kirton@qmul.ac.uk]

JOHN WRENCH is Head of Sector Research and Analysis at the European Monitoring Centre on Racism and Xenophobia, Vienna, on leave of absence from the University of Southern Denmark. The views expressed in this article do not represent those of the European Monitoring Centre.

ADDRESS: European Monitoring Centre on Racism and Xenophobia, Rahlgasse 3, A-1060, Vienna, Austria. [e-mail: john.wrench@eumc.eu.int]